

1 JONATHAN O. PENA, ESQ.  
2 CA Bar ID No. 278044  
3 Peña & Bromberg, PLC  
4 2440 Tulare St., Suite 320  
5 Fresno, CA 93721  
6 Telephone: 559-412-5390  
7 Fax: 866-282-6709  
info@jonathanpena.com  
8 Attorney for Plaintiff

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10 **UNITED STATES DISTRICT COURT**  
**EASTERN DISTRICT OF CALIFORNIA**

11 Alicia Rico Ballesteros, } Case No. 2:21-cv-00506-DMC  
12 Plaintiff, } STIPULATION AND ORDER FOR  
13 } EXTENSION OF TIME  
14 vs. }  
15 Kilolo Kijakazi, Acting }  
16 Commissioner of Social Security, }  
17 Defendant. }  
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21 IT IS HEREBY STIPULATED, by and between the parties through their  
22 respective counsel of record, with the Court's approval, that Plaintiff shall have a  
23 30-day extension of time, from February 14, 2022 to March 16, 2022, for Plaintiff  
24 to serve on defendant with PLAINTIFF'S OPENING BRIEF. All other dates in  
25 the Court's Scheduling Order shall be extended accordingly.

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27 This is Plaintiff's second request for an extension of time. Counsel for  
28 Plaintiff points out that the prior extension request has not been ruled upon. As to

this request, good cause exists for this extension. As this Court is well aware, Social Security case filings in federal court increased due to a combination of factors including an increase in appeals council decisions and an increase in hearings at the administrative levels. Then, as a result of the pandemic, shelter-in-place mandates, and Court ordered Stays, there were significant delays in producing transcripts. In recent months, Counsel for the Plaintiff has received a greater number of Answers and Certified Administrative Records from defendant including over 60 cases in November and December 2021.

For the weeks of February 14, 2022 and February 21, 2022, Counsel for Plaintiff has 15 merit briefs, and several letter briefs and reply briefs. Counsel also has 12 administrative hearings before the Office of Hearings Operations. Lastly, another attorney with the firm, Ms. Dolly Trompeter, is currently out of state due to her father's medical condition and as a result, the undersigned has taken on additional matters compounding the need for an additional extension.

Counsel for the Plaintiff does not intend to further delay this matter. Defendant does not oppose the requested extension. Counsel apologizes to the Defendant and Court for any inconvenience this may cause.

Respectfully submitted,

Dated: February 9, 2022 PENA & BROMBERG, ATTORNEYS AT LAW

By: /s/ Jonathan Omar Pena  
JONATHAN OMAR PENA  
Attorneys for Plaintiff

Dated: February 9, 2022

1 Acting Regional Chief Counsel, Region IX  
2 Social Security Administration  
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5 By: \*/s/ Kendall Rees  
6 Kendall Rees  
7 Special Assistant United States Attorney  
8 Attorneys for Defendant  
9 (\*As authorized by email on February 9, 2022)

10 IT IS SO ORDERED:  
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12 Dated: February 11, 2022  
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15 DENNIS M. COTA  
16 UNITED STATES MAGISTRATE JUDGE  
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